

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARY CALHOUN

Plaintiff,

v.

UNITED STATES POSTAL SERVICE,

Defendant.

Civil Action No.
04-10210-DPW

JOINT RULE 16.1 STATEMENT

The parties in this action submit the following Joint Statement pursuant to Local Rule 16.1 and the Court's Order of July 18, 2002:

1. **Proposed Discovery Plan:**

- a. Automatic disclosure statements and discovery shall be served on or before May 15, 2004, pursuant to the Court's Scheduling Order;
- b. All interrogatories and request for production of documents shall be served by July 15, 2004;
- c. Any Amendments pursuant to Fed. R. Civ. P. 15 shall be made by June 30, 2004;
- d. All depositions shall be completed by October 15, 2004; and
- e. A final pretrial conference shall be scheduled after decisions are rendered on any outstanding pleadings not ruled upon.

2. **Number of Depositions**

a. The plaintiff intends to take written discovery and is unable to identify particular deponents at this juncture.

b. Defendant intends to depose plaintiff and any witnesses she identifies as to her damages (the defendant may depose any fact witnesses that are no longer employees of the defendant).

Since no discovery has yet occurred, the parties cannot identify possible deponents with greater specificity at this time.

2. **Consent to Trial By Magistrate**

a. The plaintiff does not consent to a trial by magistrate in this case.

b. The defendant does not consent to a trial by magistrate in this case.

3. **Proposed Schedule for Motions**

a. All dispositive motions are to be filed by November 15, 2004.

4. **Designation of Experts**

a. Expert witnesses shall be identified by the parties by July 15, 2004.

b. If necessary, the opposing party shall have one month after July 15, 2004 in which to obtain an expert.

c. If necessary, expert interrogatories shall be served within one month following the opposing

party's disclosure of expert witnesses.

5. Final PreTrial Conference

a. The Final Pretrial Conference will be scheduled by the Court following all hearings on dispositive motions.

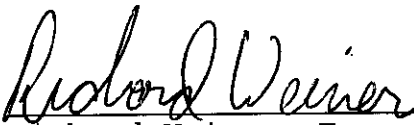
MARY CALHOUN

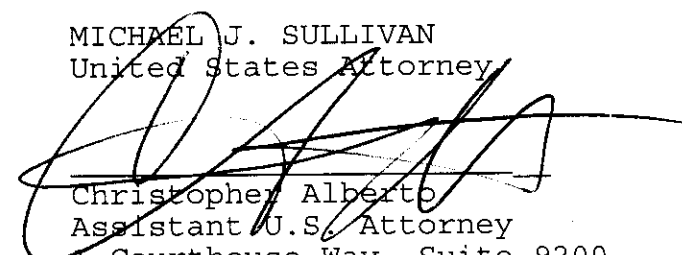
Respectfully submitted,

UNITED STATES POSTAL SERVICE,

By its Attorneys,

MICHAEL J. SULLIVAN
United States Attorney


Richard Weiner, Esq.
Ellis & Ellis
33 Pleasant Street
Boston, MA 01545
With permission 3/21/04


Christopher Alberto
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
(617) 748-3311

CERTIFICATE OF SERVICE

Suffolk, ss.

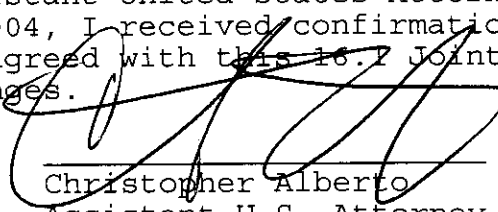
Boston, Massachusetts
March 4, 2004

I, Christopher Alberto, Assistant United States Attorney, do hereby certify that I have served a copy of the foregoing upon plaintiff's counsel of record, Richard Weiner, Esq., Ellis & Ellis, 33 Pleasant Street, Boston, MA 01545.


Christopher Alberto
Assistant U.S. Attorney

LOCAL RULE 7.1 CERTIFICATION

I, Christopher Alberto, Assistant United States Attorney, do hereby state that on March 18, 2004, I received confirmation from Attorney Richard Weiner that he agreed with this 18.1 Joint Statement and that he had no changes.


Christopher Alberto
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARY CALHOUN,

Plaintiff,

v.

UNITED STATES POSTAL SERVICE,

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Civil Action No.
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**DEFENDANT'S CERTIFICATION OF COMPLIANCE
WITH LOCAL RULE 16.1(D)(3)**

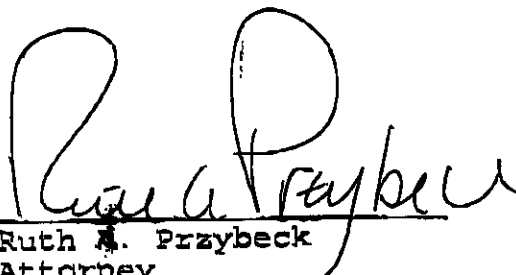
Defendant, United States and its counsel certify, pursuant to Local Rule 16.1(D)(3), that they have conferred on the following:

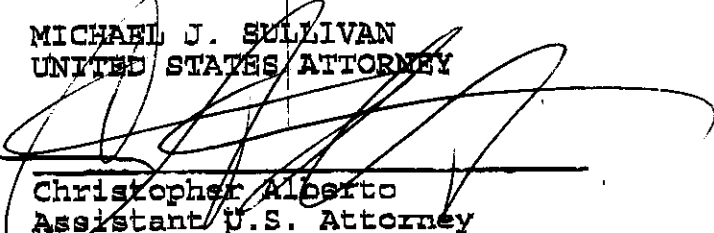
1. establishing a budget for the costs of conducting the full course, and various alternatives, of this litigation; and,
2. to consider the resolution of litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 15.4.

UNITED STATES POSTAL SERVICE,

By its Attorney,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY


Ruth A. Przybeck
Attorney
United States Postal Service

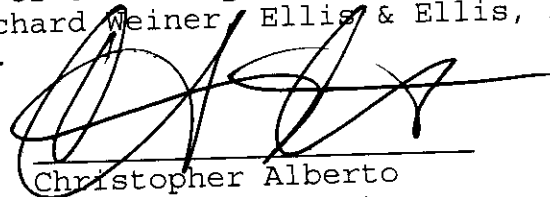

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1 Courthouse Way, Suite 9200
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(617) 748-3311

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
March 24, 2004

I, Christopher Alberto, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing upon plaintiff's counsel of record, Richard Weiner, Ellis & Ellis, 33 Pleasant Street, Boston, MA 01545.



Christopher Alberto
Assistant U.S. Attorney